

STATE OF COLORADO

Bill Owens, Governor
Jane E. Norton, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

HAZARDOUS MATERIALS AND WASTE MANAGEMENT DIVISION
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Colorado Department
of Public Health
and Environment

February 9, 2001

Joseph Legare, Assistant Manager
Environment & Infrastructure
U.S. Department of Energy, RFFO
10808 Highway 93, Unit A
Golden, Colorado 80403-8200

Dyan Foss
Kaiser-Hill, L.L.C.
Rocky Flats Environmental Technology Site
10808 Highway 93, B130
Golden, CO 80403-8200

RE: Comments on Final Draft of the Building 371/374 Decommissioning Operations Plan
(DOP)

Dear Ms. Foss and Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the "Division") has reviewed the *Building 371/374 Closure Project Decommissioning Operations Plan (DOP), Final Draft* dated December 20, 2000. The Building 371/374 DOP describes how decommissioning activities will be performed for Type 2 and Type 3 facilities within the Building 371/374 Closure Project at the Rocky Flats Environmental Technology Site (RFETS). Overall, the Division has found the 371/374 DOP to be a well-written document that does not require many significant changes. The Division has prepared a list of comments and questions related to the 371/374 DOP, which are attached and were sent to RFETS via e-mail on February 8, 2001. If you have any questions or would like to discuss these comments, please contact James Hindman at (303) 692-3345.

Sincerely,

Steven H. Gunderson
RFCA Project Coordinator

James A. Hindman
Building 371/374 Closure Project Coordinator



Attachment

cc: F. Gerdeman, DOE-RFFO
D. Shelton, Kaiser-Hill
J. Stevens, Kaiser-Hill
T. Rehder, EPA Region VIII

S. Gunderson, CDPHE
D. Onyskiw, CDPHE
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Administrative Records, RFETS Building 850

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ADMIN RECORD

B371-A-000017

- ductwork will remain connected to the ventilation system (especially, the possibility of the ventilation system going down must be considered).
11. Section 4.4.1, (5th paragraph from the end of section): Specify the safety analysis and radiation protection thresholds that will allow plenums to be removed.
 12. Section 4.4.2: The 6th bullet under the second paragraph of this section indicates that I/O stations will be dismantled prior to the decontamination of the structure. However, the second to the last paragraph of this section states, "The I/O stations will be decontaminated when the CSV is decontaminated." Please resolve this apparent discrepancy.
 13. Section 4.4.2 (5th paragraph): Describe what is meant by the phrase, "... the man-lift will be covered"
 14. Section 4.4.2 (4th paragraph, 5th paragraph, 7th paragraph, 8th paragraph, and last paragraph): There are several instances where it is stated that materials and equipment will be removed and managed as either TRU waste or LL waste. Since the CSV is a RCRA permitted unit, all material and equipment removed from the CSV must be adequately characterized for possible RCRA contamination.
 15. Section 4.4.2 (5th paragraph): Describe how the adapters will be installed for the fogging activities. Will it be necessary to breach the CSV structure? How will releases of contamination from the CSV be released during the installation of the adapters.
 16. Section 4.4.3 (3rd paragraph): The first sentence of this paragraph states that mechanical and process equipment will be managed as TRU or LL waste. This seems to be inconsistent with what is stated in the previous paragraph (that this equipment will be managed as TRU or TRM waste). A hazardous waste determination must be made for all waste removed.
 17. Sections 4.4.3.1, 4.4.3.2, and 4.4.3.5: The document states that Room 2327 is moderately contaminated and will be stripped out as LL waste. An adequate hazardous waste determination must be made for all wastes removed. Additionally, since there were known releases of acidic hazardous wastes, the cement floors in the Incinerator Scrubber Canyon, in the Precipitation/Calcination Canyon, and at least the localized etched areas and splash areas on the floor and walls in the Residue Ion Exchange Canyons should be sampled for radiological and chemical (RCRA) contamination or be removed and managed as mixed waste.
 18. Section 4.4.5.1: The first and third bullets in this section seem to be inconsistent. The first bullet describes the first step to prepare equipment for the centralized size reduction facility and states that the equipment will be decontaminated. The third bullet states that the third step will be to fix contamination on the equipment.

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CDPHE Comments on draft B371/374 DOP

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grading activities occur. The DOP needs to describe the management of any contaminated soils encountered.

29. Section 4.5.5: This section assumes that large tanks from Building 374 will be allowed to remain in place until demolition. However, it is possible that the tanks will need to be removed earlier in order to address under-building contamination. This section should describe how such a scenario would be managed.

Additionally, describe how portions of the building that are below the ground surface (e.g., Room 2804 in Building 374) will be managed during the demolition phase. How will precipitation be managed after the roof is removed from these areas? Does RFETS intend to backfill these areas?

Describe the rationale for abandoning the underground duct banks at the Building 371 Electrical Switch Yard. Do these duct banks have any lead sheathing?

30. Section 4.5.6, Step 5: The Division is not convinced that the rubble pile resulting from the collapse of the main portion of Building 371 will be "... fairly flat and uniform, and free of large voids." Thus, it is not appropriate to propose that the pile will be left as is with some surficial back filling as proposed.
31. Section 5: Have all waste chemicals been removed from the Exclusion Areas? If not, the DOP must describe how these remaining waste chemicals will be managed and disposed of.
32. Section 5.1.1: The last sentence of this section must be corrected to refer to idle equipment rather than mixed residue tanks.
33. Section 5.2: The reference to 6 CCR 1007-3, Part 264.1(g)(6) is incorrect. Generator Treatment provisions are found under 6 CCR 1007-3, Section 100.21(d).
34. Section 10: The DOP does not satisfy the notification requirements for the referenced RSOPs. Notification of the implementation of the RSOPs must follow the notification requirements specified in the respective RSOP.
35. Section 11.1: The Building 371/374 Closure Project AR file also includes all other documents referenced in the *RSOP for Facility Disposition* and in the *RSOP for Facility Component Removal, Size Reduction and Decontamination Activities*, and all related correspondence.